

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

In Re:

Renan Jose Canto-Llanes,

Debtor.

Chapter 13

Case No.: **19-48313**

Judge **Maria L. Oxholm**

**DEBTOR'S SECOND PROPOSED CHAPTER 13 PLAN
POST-CONFIRMATION MODIFICATION**

NOW COME the Debtor, Renan Jose Canto-Llanes, by and through their attorney, New Start Law Group, PLLC, and for their Second Post-Confirmation Chapter 13 Plan Modification, say as follows:

1. Debtors' Overall expenses have changed as well as Debt; the Debtors have fallen behind in payments due to loss on income during the Pandemic.
2. Debtor's Non-Filing Spouse has now found new employment allowing for more available income
3. Debtor has filed with the Court Amended Schedules I and J to reflect this change.
4. The Plan payment is increased to \$1,938.36 to cover the Delinquency and allow the Plan to complete timely.
5. This Plan Modification will have no effect on Creditors.
6. The modification has the following impact of the classes of creditors being paid by the Trustee as follows:

- a. Class One Trustee's Fees: NONE.
- b. Class Two administrative claims: NONE
- c. Class Three secured claims stripped of collateral: NONE
- d. Class Four secured claims (last payment beyond the Plan): NONE
- e. Class Five secured claims (last payment within the Plan): NONE
- f. Class Six executory contracts and/or unexpired leases: NONE
- g. Class Seven priority unsecured claims: NONE
- h. Class Eight special unsecured claims: NONE
- i. Class Nine general unsecured claims: NONE.

7. Debtor modifies their Chapter 13 Plan to provide for an increase in their plan payment to \$1,938.36 monthly.

WHEREFORE, Debtors request this Court enter the Order Granting Chapter 13 Plan Modification in the form attached hereto as **Exhibit A**.

/s/ Richard H. Clark
Richard H. Clark (P69849)
New Start Law Group, PLLC
30833 Northwestern Hwy., Suite 200
Farmington Hills, MI 48334
(248) 626-3723
rhclark@newstartlawgroup.com

Dated: June 9, 2022

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT

In Re:

Renan Jose Canto-Llanes,
Debtor.

Chapter 13
Case No.: **19-48313**
Judge **Maria L. Oxholm**

ORDER TO MODIFY DEBTORS' SECOND CHAPTER 13 PLAN
POST-CONFIRMATION

This matter having come before the Court on the Debtors' Chapter 13 Plan Modification, Notice of same being mailed to all interested parties and no objections having been filed, the Court having considered the matter and being fully advised on the premises;

IT IS HEREBY ORDERED that Debtors' Chapter 13 Plan shall be modified as follows:

A. The Monthly Chapter 13 Plan payment shall be increased effective Immediately from \$1,582.00 to \$1,938.36 per Month;

IT IS FURTHER ORDERED that all other terms than those stated herein of the Order Confirming Plan (Docket No. 26) are in full force and effect.

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**NOTICE OF DEADLINE TO OBJECT TO DEBTOR'S SECOND PROPOSED
CHAPTER 13 POST-CONFIRMATION PLAN MODIFICATION**

The deadline to file an objection to the attached proposed Chapter 13 Post-Confirmation Plan Modification is **21 days** after service.

If no timely responses are filed to the proposed Chapter 13 Post-Confirmation Plan Modification, the proponent may file a certificate of no response and request entry of an Order approving the Chapter 13 Post-Confirmation Plan Modification.

If a timely objection is filed, the Court will set the matter for hearing and give notice of the hearing to the Debtor, the proponent of the Chapter 13 Post-Confirmation Plan Modification, the Trustee and any objecting parties. In that event, the Chapter 13 Post-Confirmation Plan Modification will become effective when the Court enters an order overruling or resolving all objections.

Objections to the attached proposed Chapter 13 Post-Confirmation Plan Modification shall be served on the following:

Richard H. Clark
Law Office of Richard H. Clark, PLLC
30833 Northwestern Hwy., Suite 224
Farmington Hills, MI 48334

Tammy L. Terry (P46254)
535 Griswold Street, Suite 2100
Detroit, MI. 48226-3681

Respectfully submitted,

/s/ Richard H. Clark

Richard H. Clark (P69849)
New Start Law Group, PLLC
Attorneys for Debtor
30833 Northwestern Hwy., Suite 200
Farmington Hills, MI 48334
(248) 626-3723
rhclark@newstartlawgroup.com

Dated: June 9, 2022

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CERTIFICATE OF SERVICE

Katielyn M Garelik, certifies that on the 9th day of June 2022 she served a copy of Notice Of Debtors Second Chapter 13 Plan Post-Confirmation Modification, proposed Order, Notice of 21 Day Response Rule and this Certificate of Service upon the following parties with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Tammy L. Terry, Chapter 13 Trustee

Katielyn M Garelik, certifies that on the 9th day of June 2022 she served a copy of Notice Of Debtors Second Chapter 13 Plan Post-Confirmation Modification, proposed Order, Notice of 21 Day Response Rule and this Certificate of Service upon all creditors listed on the mailing Matrix listed on Exhibit "A" attached.

/s/ Katielyn M Garelik
Katielyn M Garelik
For Richard H. Clark (P69849)
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30833 Northwestern Hwy., Suite 200
Farmington Hills, MI. 48334
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